

1 **Kevin R. Martin, SBN 176853**

2 [kmartin@randicklaw.com](mailto:kmartin@randicklaw.com)

3 **Brian M. O'Dea, SBN 45704**

4 [bodea@randicklaw.com](mailto:bodea@randicklaw.com)

5 **Patrick E. Guevara SBN 202727**

6 [pguevara@randicklaw.com](mailto:pguevara@randicklaw.com)

7 **RANDICK O'DEA & TOOLIATOS, LLP**

8 5000 Hopyard Road, Suite 400

9 Pleasanton, California 94588

Telephone (925) 460-3700

Facsimile (925) 460-0969

10 Attorneys for Defendants, Counter Claimants and Third Party Claimants ROBERT E.  
11 ESTUPINIAN, GINNY ESTUPINIAN and MUTUAL VISION, LLC, and Defendants and  
12 Third Party Claimants MILLENNIUM REALTY GROUP, VESTA REVERSE 100, LLC,  
13 VESTA CAPITAL ADVISORS, LLC, EDMUNDO ESTUPINIAN, and HAYDEE  
14 ESTUPINIAN

15 **UNITED STATES DISTRICT COURT OF CALIFORNIA**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 **SAN JOSE DIVISION**

18 VESTA STRATEGIES, LLC,

19 Plaintiff,

20 vs.

21 ROBERT E. ESTUPINIAN, GINNY  
22 ESTUPINIAN, MUTUAL VISION, LLC,  
23 MILLENNIUM REALTY GROUP,  
24 VESTA REVERSE 100, LLC, VESTA  
25 CAPITAL ADVISORS, LLC, CAROL-  
26 ANN TOGNAZZINI, EDMUNDO  
27 ESTUPINIAN, and HAYDEE  
28 ESTUPINIAN,

Defendants.

AND RELATED CROSS-ACTIONS.

Case No.: C 07-06216 JW RS

**MOTION OF DEFENDANTS, COUNTER  
CLAIMANTS, AND THIRD PARTY  
CLAIMANTS ROBERT E. ESTUPINIAN  
AND GINNY ESTUPINIAN FOR AN  
ORDER COMPELLING  
PLAINTIFF/COUNTER DEFENDANT  
VESTA STRATEGIES, LLC AND  
COUNTER DEFENDANT/THIRD PARTY  
DEFENDANT JOHN TERZAKIS TO  
PRODUCE TAX RECORDS AND  
DOCUMENTS**

Defendants, counter claimants and third party claimants Robert E. Estupinian and Ginny  
Estupinian respectfully move this Court for an order requiring plaintiff/counter defendant Vesta  
Strategies, LLC and counter defendant/third party defendant John Terazkis to produce to moving

1 parties tax and financial records of Vesta Strategies, LLC, and to pay moving parties attorneys'  
2 fees.

3 This motion is based upon the Memorandum of Points and Authorities and Declarations  
4 of Robert Estupinian, David Buchanan and Brian O'Dea, filed herewith.

5 Date: April 30, 2008

RANDICK O'DEA & TOOLIATOS, LLP

7  
8 By: /s/  
Brian M. O'Dea